

**COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION**

Anthony Campbell

Complainant

Vs.

MCAD Docket No. 02SEM02493

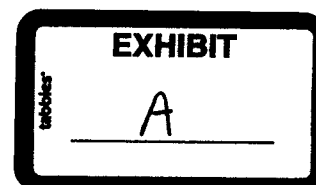
Isolation Technologies, Inc.

Respondent

Affidavit of Peter Zekos

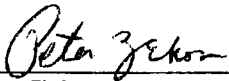
I, Peter Ziekas, hereby state as follows:

1. I am the President of Excel Staffing, Inc., located in Westboro, Massachusetts.
2. From time to time, Excel hires employees for placement into temporary positions at Isolation Technologies, Inc. ("Isolation")
3. After an Excel employee has worked at Isolation for 560 hours, Isolation may choose to hire him/her as a direct employee of Isolation, without incurring any additional charge or obligation to Excel.
4. In or about late September, 2001, Excel hired Anthony Campbell for placement as a temporary machine operator at Isolation.
5. Shortly after Mr. Campbell's placement, Larry D'Amato, Isolation's Operations Manager, contacted me and asked me to increase Mr. Campbell's hourly rate by one dollar, agreeing to pay the extra cost which would result to Isolation.
6. Sometime in January, 2002, Mr. D'Amato advised me that he would be making a job offer to Mr. Campbell. Between January and April, 2002, Mr. D'Amato informed me that Mr. Campbell had rejected Isolation's job offer, but that he was continuing to try to convince him to accept.
7. Mr. Campbell told me that he was not going to accept Isolation's job offer at that time because he needed to have more money than they were offering.
8. At no time did Mr. Campbell complain of any discriminatory treatment by Mr. D'Amato or anyone at Isolation.
9. At no time did Mr. Campbell tell me that anyone at Isolation had made racial or derogatory remarks of any nature to him while he was assigned there.



10. While trying to get Mr. Campbell to consider employment with Isolation, Mr. D'Amato retained him on temporary assignment for a duration far greater than was necessary.

Signed and sworn under pains and penalties of perjury this 3rd day of October, 2002.



Peter Zekos